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July 7, 2022

Via ECF

The Honorable Hector Gonzalez
U.S. District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: ***Pasha Probiv v. PayCargo et al.***, Case No. 1:22-cv-02907-HG-JRC.

Dear Judge Gonzalez:

Xander Law Group, P.A. respectfully submits this correspondence on its own behalf as a party in this action and joins and adopts the written request for pre-motion conference in connection with a planned motion to dismiss the claims of Plaintiff, Pasha Probiv, submitted by the other defendants in this action (DE 16) and as applied to Xander Law Group, P.A..

The legal arguments and factual basis are the same as to Xander Law Group, P.A. as they are for the other defendants, as articulated in DE16, except with the addition of the facts that Xander Law Group, P.A. is a Florida corporation, none of its attorney members or associates are licensed to practice law in New York and none of its shareholders reside in New York.

We look forward to discussing these matters with the Court during an upcoming pre-motion conference. Thank you for your attention and consideration of this matter.

Respectfully submitted,

/s/ Jose Teurbe-Tolon
Jose Teurbe-Tolon, Esq.
FL Bar No.: 87791
Appearing *Pro Hac Vice*

cc: Plaintiff, Pasha Probiv
All Counsel of Record